



Frank O. Bannon  
Governor

Lori F. Kaplan  
Commissioner

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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June 23, 2003

Mr. David L. Gawthrop  
Robert Weed Plywood - Moldings Division  
57784 County Road 3 South  
Elkhart, IN 46514

Re: 039-17741-00282  
Fifth Administrative Amendment to  
Part 70 Permit T039-7432-00282

Dear Mr. Gawthrop:

Robert Weed Plywood - Moldings Division was issued a Part 70 Permit on August 31, 1999 for a wood molding and surface coating operation. A letter requesting the following change was received by IDEM, OAQ on May 13, 2003:

(a) The source currently has a paint booth that is operating as a laboratory and is considered a insignificant activity. The source now wishes to use this booth for a production process. The potential to emit from this booth in its new capacity are 4.76 tons per year (tpy) PM, 1.87 tpy VOC and 0.0389 tpy HAP. Therefore, the booth will maintain its insignificant status. The requested change will therefore be viewed as a descriptive change. Pursuant to 326 IAC 2-7-11(a)(7), an Administrative Amendment to Part 70 Permit T039-17741-00282 is hereby approved as follows:

(1) One (1) spray paint booth, uncontrolled.

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), the paint booth is exempt because it uses less than 5 gallons of coating per day.

The paint booth is not a specifically regulated insignificant activity, therefore it will not be added to Section A.3 of the permit, therefore, there is no need for the Title V permit to be revised.

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Alic Bent at (973) 575-2555 x3206, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,  
Original signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

## Attachments

AB/EVP

cc: File - Elkhart County

Air Compliance Section Inspector - Greg Wingstrom

Compliance Data Section - Karen Nowak

Raybestos Products Company  
Crawfordsville, Indiana

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AA 107-17259-

00007

Permit Reviewer: AB/EVP

Technical Support and Modeling - Michele Boner  
Administrative and Development

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

Page 1 of 1 TSD App A

**Company Name: Robert Weed Plywood - Moldings Division  
Address City IN Zip: 23551 Cooper Drive, Elkhart, IN 46516  
Permit ID: AA 039-17741-00282  
Reviewer: Alic Bent/EVP  
Date: June 19, 2003**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
W-B Topcoat	8.1	11.94%	0.0%	11.9%	0.0%	32.96%	0.00313	133.330	0.97	0.97	0.41	9.73	1.78	4.59	2.95	65%
Water	8.3	100.00%	100.0%	0.0%	100.0%	0.00%	0.00125	133.330	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65%
Aqua-Chem Lamp Black	9.2	22.49%	0.0%	22.5%	0.0%	0.00%	0.00000	133.330	2.06	2.06	0.00	0.03	0.01	0.01	0.00	65%
Aqua-Chem Organic Yellow	10.0	22.80%	0.0%	22.8%	0.0%	0.00%	0.00002	133.330	2.28	2.28	0.01	0.16	0.03	0.03	0.00	65%
Aqua-Chem Burnt Umber	12.5	14.16%	0.0%	14.2%	0.0%	0.00%	0.00002	133.330	1.77	1.77	0.00	0.12	0.02	0.05	0.00	65%
Aqua-Chem Titanium White	17.5	10.06%	0.0%	10.1%	0.0%	0.00%	0.00002	133.330	1.76	1.76	0.00	0.08	0.02	0.05	0.00	65%
Aqua-Chem Red Iron Oxide	14.2	12.43%	0.0%	12.4%	0.0%	0.00%	0.00002	133.330	1.76	1.76	0.00	0.09	0.02	0.04	0.00	65%

**Uncontrolled Potential Emissions**

**0.43      10.22      1.87      4.76**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)